

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

VS.

CAUSE NO. CR3:21cr00107

THOMAS IROKO AYODELE

**MOTION TO WITHDRAW, MOTION REQUESTING IFP AND APPOINTMENT OF COUNSEL**

COMES NOW, William F. Travis, appointed trial counsel for and on behalf of defendant Thomas Iroko Ayodele and moves this honorable court to allow trial counsel to withdraw and for appointment of substitute counsel for defendant's appeal. In support thereof, irreconcilable differences have arisen and counsel would further state that defendant desires to discharge William F. Travis as his attorney of record and counsel for defendant desires to be discharged (See Exhibit "A"). Further, that defendant may be allowed to proceed *In Forma Pauperis* for purposes of appeal to the Fifth Circuit Court of Appeals.

SO MOVED this the 20<sup>th</sup> day of June, 2023.

Respectfully submitted,

/s/ William F. Travis  
William F. Travis, MSB 8267  
Attorney for Defendant  
8619 Highway 51 N.  
Southaven, MS 38671  
(662)393-9295

### **CERTIFICATE OF SERVICE**

I, the undersigned attorney, do hereby certify that a true and correct copy of the foregoing MOTION TO WITHDRAW, MOTION REQUESTING IFP AND APPOINTMENT OF COUNSEL has this day been electronically mailed to:

Honorable Robert Mims  
[robert.mims@usdoj.gov](mailto:robert.mims@usdoj.gov)

Honorable Clyde McGee, IV  
[clyde.mcgee@usdoj.gov](mailto:clyde.mcgee@usdoj.gov)

Mr. Thomas Iroko Ayodele  
c/o LCDC

**THIS**, the 20<sup>th</sup> day of June, 2023.

/s/ William F. Travis  
William F. Travis, Certifying Attorney